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Attorneys for Defendant Stephen Alan Wynn

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 BRENNA SCHRADER, an individual, on
11 behalf of herself and all others similarly
situated,

Case No.: 2:19-cv-02159-JCM-BNW

12 Plaintiff,

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANT STEPHEN ALAN WYNN
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

13 || vs.

14 STEPHEN ALAN WYNN; an individual;
15 MAURICE WOODEN, an individual,
16 WYNN LAS VEGAS, LLC dba WYNN
17 LAS VEGAS a Nevada Limited Liability,
WYNN RESORTS, LTD, a Nevada Limited
Liability Company; and DOES 1-20,
inclusive; ROE CORPORATIONS 1-20,
inclusive,

(FIRST REQUEST)

Defendants.

Defendant Stephen Alan Wynn ("Mr. Wynn"), by and through his counsel of record, the law firm of Peterson Baker, PLLC, and Plaintiff Brenna Schrader ("Plaintiff"), by and through her counsel of record, the Richard Harris Law Firm, hereby agree and stipulate, subject to the Court's approval, as follows:

24 1. Plaintiff filed her Class Action Complaint for Damages ("Complaint") in the Eighth
25 Judicial District Court, Clark County, Nevada on September 26, 2019.

26 2. Defendants Wynn Las Vegas, LLC and Wynn Resorts, Ltd. removed the action to
27 this Court on December 16, 2019. See Notice to Federal Court of Removal of Civil Action from
28 State Court (ECF No. 1).

1 3. Prior to removal, Plaintiff attempted to serve Mr. Wynn on or about December 11,
2 2019, with a copy of the Complaint and Summons issued by the state court on or about September
3 27, 2019. An affidavit of service was filed as to that attempt.

4 4. Mr. Wynn has not waived any issues regarding defective and/or insufficient service
5 of process in connection with the events that occurred on or about December 11, 2019, and has
6 reserved the right to file a motion to dismiss upon this basis.

7 5. However, by email dated December 12, 2019, Mr. Wynn's counsel offered to accept
8 service of the Summons and Complaint.

9 6. Pursuant to Fed. R. Civ. P. 81, Mr. Wynn's response to the Complaint would be due
10 21 days following execution of an Acceptance of Service, whenever executed, or at the earliest, 21
11 days from the date of attempted service on December 11, 2019, or January 2, 2020.

12 7. In light of the foregoing, both Plaintiff and Mr. Wynn agree that in order to promote
13 the just, speedy, and inexpensive determination of this proceeding, it is necessary for a date certain
14 for Mr. Wynn's answer or other response to the Complaint.

15 8. Further, due to the class and collective claims alleged in the Complaint, Mr. Wynn
16 requires additional time to investigate Plaintiff's allegations before responding to the Complaint.

17 9. So there is no ambiguity, the parties have agreed to extend any deadline for Mr.
18 Wynn to file an answer or other response to the Complaint [ECF No. 1-1] from January 2, 2020 to
19 and including February 3, 2020.

20 10. This is the first request for an extension of time for Mr. Wynn to file an answer or
21 other response to Plaintiff's Complaint.

22 11. This request is made in good faith and not for the purpose of delay.

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1 12. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
2 as waiving any claim and/or defense held by any party.

3 Dated this 2nd of January, 2020.

4 Respectfully submitted,

5 **PETERSON BAKER, PLLC**

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6 **RICHARD HARRIS LAW FIRM**

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13 **ORDER**

14 IT IS SO ORDERED.

15 1/3/20

16 DATED: _____



17 UNITED STATES MAGISTRATE JUDGE

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